



U.S. Department of Justice

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February 14, 2006

The Honorable Mary Pat Thyng
U.S. Magistrate Judge
U.S. District Court
844 King Street
Wilmington, DE 19801

**Re: United States v. Charles Ceaser
Case No. 05-po-4 (MPT)**

Dear Magistrate Judge Thyng:

Eleni Kousoulis, attorney for the defendant, has informed me that her client accepts the Government's Memorandum of Plea Agreement. Therefore, the parties respectfully request that the Court schedule a guilty plea hearing. A copy of the proposed Memorandum of Plea Agreement is attached.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

BY: /s/
Beth Moskow-Schnoll
Assistant United States Attorney

cc: Eleni Kousoulis, Esq.
Clerk, U.S. District Court

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES CEASER,

Defendant.

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Case No. 05-po-4 (MPT)

MEMORANDUM OF PLEA AGREEMENT

Pursuant to discussions between the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Beth Moskow-Schnoll, Assistant United States Attorney for the District of Delaware, and the defendant, Charles Ceaser, by and through his attorney, Eleni Kousoulis, Esquire, the following agreement is hereby entered into by the respective parties:

1. The defendant shall plead guilty to Count One of the Information. Count One charges the defendant with Obstruction of Mails, in violation of Title 18, United States Code, Section 1701, which carries a maximum penalty of six months imprisonment, a \$5,000 fine, one year supervised release, and a mandatory special assessment of \$10.

2. The defendant admits the following facts. At all times relevant to the Information, the defendant was employed by the United States Postal Service as a Full-time City Carrier in Wilmington, Delaware. On or about August 11, 2005, the defendant failed to deliver at least two letters that had been entrusted to him and stole the cash contents of one of those letters.

3. The defendant agrees to pay the \$10 special assessment on the day of sentencing.

4. The defendant further agrees to pay restitution to the United States Postal Service as part of his sentence.

5. The defendant understands that, because he is charged with a Class B misdemeanor, pursuant to USSG § 1B1.9, the United States Sentencing Guidelines do not apply to the instant case. At sentencing, the Court must consider the factors enumerated in 18 U.S.C. §3553(a) in exercising its discretion to determine the appropriate sentence. The defendant recognizes that the Court is not bound by any stipulations or recommendations of the parties. The defendant agrees that he will not be allowed to withdraw his guilty plea because the Court imposes a sentence contrary to any stipulation of the parties or recommendation of his attorney.

6. The United States Attorney reserves the right to defend any ruling of the Sentencing Court should there be an appeal from this case.

7. It is further agreed by the undersigned parties that this Memorandum supersedes all prior promises, representations, and statements of the parties; that this Memorandum may be modified only in writing signed by all the parties; and, that any and all promises, representations, and statements made prior to or after this Memorandum are null and void and have no effect whatsoever.

COLM F. CONNOLLY
United States Attorney

Eleni Kousoulis, Esquire
Attorney for Defendant

By: _____
Beth Moskow-Schnoll
Assistant United States Attorney

Charles Ceaser
Defendant
Dated:

AND NOW, this _____ day of _____, 2006, the foregoing Memorandum of Plea Agreement is hereby (accepted) (rejected) by this Court.

HONORABLE MARY PAT THYNGE
United States Magistrate Judge
District of Delaware